

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CARLOS ENRIQUE LUNA LAM and  
IGLESIA CRISTIANA CASA DE DIOS,**

**Plaintiffs,**

**v.**

**TRINITY FOUNDATION, INC., and  
PETE EVANS,**

**Defendants.**

**Civil Action No.**

**Jury Trial Demanded**

**COMPLAINT**

Plaintiffs, Carlos Enrique Luna Lam (“Pastor Luna”) and Iglesia Cristiana Casa de Dios (“Casa de Dios”) (collectively, “Plaintiffs”), by and through their undersigned counsel, file this Complaint against Defendants Trinity Foundation, Inc. (“Trinity”) and Pete Evans (“Evans”), and allege as follows:

**SUMMARY OF THE ACTION**

1. Pastor Luna is a well-respected and beloved pastor, and co-founder of Casa de Dios, an evangelical church in Guatemala that offers faith-based programs and helps provide free meals, free health care, and disaster relief assistance throughout the country. Since Casa de Dios’ founding in 1994, Pastor Luna and Casa de Dios have built a devoted congregation through positive messages, good deeds and outspoken criticism of corruption that plagues Guatemala and Latin America.

2. Trinity is a controversial religious group based in Dallas, Texas. Trinity is on a mission to extinguish televangelism because it believes that televangelists preach a theology that

Trinity contends to be fraudulent and blasphemous. According to its website, Trinity claims that it seeks to “reveal and expose” the alleged “deception” of televangelists and make them accountable. It has been reported that Trinity, which has been described by former members as a religious cult, is known for its “gung-ho” approach and extreme investigative methods, such as 24/7 taping of televangelists’ shows, diving into dumpsters, going undercover, and telling lies if necessary.

3. This lawsuit is necessary because Trinity has wrongfully targeted Pastor Luna and Casa de Dios and attacked them by publishing false, defamatory and extremely inflammatory statements on Trinity’s website and Facebook page. The statements falsely and maliciously accuse Pastor Luna of, among other things, being closely connected to a convicted drug trafficker, Marlory Chacón Rosell (known as “The Queen of the South”), acting as her supposed “advisor”, and allegedly accepting and laundering large sums of money for Ms. Chacón, including in connection with the construction of a new church for Casa de Dios.

4. **These statements are 100% false.** Pastor Luna was **not** Ms. Chacón’s advisor in any capacity. Plaintiffs never requested or received any money from Ms. Chacón for any reason whatsoever, including to build a new church. Plaintiffs have never laundered money for Ms. Chacón or anyone else. Plaintiffs built the church with funds from contributions by its congregation and other legitimate sources.

5. Pastor Luna and Casa de Dios bring this lawsuit to protect their integrity and hard-earned reputations, and to hold Trinity responsible for their false, defamatory and extremely harmful attack on Plaintiffs, which were published with reckless disregard for the truth.

### **THE PARTIES**

6. Plaintiff Carlos Enrique Luna Lam is an individual domiciled in Guatemala.

7. Plaintiff Iglesia Cristiana Casa de Dios is an evangelical church organized and existing under the laws of the country of Guatemala. Pastor Luna co-founded and preaches at Casa de Dios.

8. Defendant Trinity Foundation, Inc. is a Texas corporation with its principal place of business in Dallas, Dallas County, Texas. On information and belief, Trinity owns and operates the Trinity website, located at <https://trinityfi.org> (the “Trinity Website”), and maintains and operates a public Facebook account and page for Trinity (the “Trinity Facebook Page”). Trinity Foundation, Inc. may be served with process at 5640 Columbia Avenue, Dallas, Texas 75214, and by serving it’s registered agent at 2485 E. Southlake Boulevard, Suite 110, Southlake, Texas 76092.

9. Defendant Pete Evans is an individual domiciled in Dallas, in Dallas County, Texas. Evans, identified on Trinity’s website as Trinity’s “Secretary/Treasurer”, is on information and belief, a lead investigator for Trinity and the author of the false and defamatory statements in the post on Trinity’s website and Trinity’s Facebook page at issue in this case. Pete Evans may be served with process at 5640 Columbia Avenue, Dallas, Texas 75214.

### **JURISDICTION AND VENUE**

10. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332, because the parties are completely diverse and the amount in controversy exceeds the statutory minimum.

11. Venue is proper under 28 U.S.C. § 1391(b)(1) and (2) because Trinity and Evans reside in this District, and a substantial part of the events giving rise to the claim(s) herein occurred in this District.

**STATEMENT OF RELEVANT FACTS**

**Pastor Luna and Casa de Dios**

12. Pastor Luna and his wife, Sonia Luna, founded Casa de Dios, an evangelical church, in 1994.

13. Pastor Luna and Casa de Dios hold weekly services and maintain an active calendar of faith-based programs and events.

14. Since 2006, Casa de Dios has operated a monthly food bank that distributes over 2 million meals annually to needy families in Guatemala through its partner social outreach institutions.

15. Casa de Dios owns six (6) large mobile medical facilities that travel throughout the country to provide medical and dental care to people who cannot otherwise obtain or afford it.

16. Casa de Dios also provides support to more than 100 widows in the community who have no relatives.

17. Casa de Dios, together with the help of volunteers from its congregation, has also provided vital aid to regions affected by natural disasters throughout Guatemala, including Hurricane Mitch in 1998, Hurricane Stan in 2005, the El Cambray II landslide in 2015, and the catastrophic volcanic eruption of Volcán de Fuego in June 2018, which impacted over 1.7 million people. In the aftermath of Volcán de Fuego's eruption, Casa de Dios and its volunteers distributed more than 50 tons of food, water, clothing and medicine, and organized a group of professionals to provide emotional support for those affected.

18. Pastor Luna is an outspoken critic of political and corporate corruption in Guatemala. He has been praised for his courage to speak out against powerful interests who seek

to maintain the status quo but at the same time, Pastor Luna also has become a target of the powerful, who seek to undermine and silence him through lies and corruption.

### **Trinity**

19. Trinity is a controversial and extremist religious group founded and led by Ole Anthony (“Anthony”), with a mission to attack and “expose” televangelists and religious leaders who use media to preach theologies that Trinity may disagree with.

20. On its website, Trinity claims that it “began in 1972 as a religious, charitable and educational non-profit foundation for promoting the public interest in the State of Texas by producing Christ-centered communications projects.” However, Trinity claims, “[a] growing number of TV preachers were appealing for funds and receiving millions of dollars with no accountability using the broadcast airwaves.” Trinity describes televangelists as follows: “Living luxurious lifestyles while at the same time preying on society’s most vulnerable, they are preaching a gospel that promoted materialism and greed – using the language of Christianity while mocking its most valued historical tenets, like self-sacrifice and humility.” According to Trinity, it adjusted its mission to “reveal and expose th[e] deception and try to make televangelists accountable to the rule of law and common decency” because the “real Christian message was getting lost” with “so many false echoes” by televangelists.

21. As such, Trinity has a strong animus and vendetta against Plaintiffs because they use media to disseminate their sermons. Trinity targeted Plaintiffs for attack and supposed “exposure” because Trinity does not agree with their theology. In doing so, Trinity has a preconceived agenda and storyline that it wants to tell or “expose” about Plaintiffs, among other religious leaders, accusing them of being corrupt, immoral, materialistic, and greedy criminals who are breaking the law and engaging in fraudulent and blasphemous activities.

22. Trinity claims that by 1987 it “began full-time monitoring of religious programming and reporting abuses of the public trust.” Trinity further claims that by the 1990s it “had become the [supposed] leading ‘watchdog’ of religious media, conducting investigations and providing information used to expose fraud and abuses committed in the name of God.”

23. Trinity has been described as a “blaspheming parody of Christianity, an ego trip for Ole Anthony, a cult or a tax shelter...” In an interview with the *Dallas Observer* in 2006, Anthony called the media “whores” and the *Dallas Observer* described the media as being “too busy begging [Anthony] for incriminating documents or B-rolls of the televangelists’ shows” to delve into Trinity itself, its teachings, or its controversial investigative approach and practices.

24. One former member of Trinity has written a book about the group, entitled “*I Can’t Hear God Anymore: Life in a Dallas Cult*.” The *Dallas Observer* has reported that allegations of Trinity being a cult began as early as the late 1970’s and have surfaced many times since. The *Dallas Observer* also reported that additional former Trinity members have described Trinity as a religious cult and/or that Trinity bears cult-like traits, such as: (a) zealous commitment to a domineering leader not accountable to any authority; (b) discouragement or punishment of dissent and doubt; (c) use of mind-altering techniques such as denunciation sessions, which has included “hot seats” where Anthony subjected followers to scathing verbal attacks that were supposed to be cleansing, but brought the followers under Anthony’s control and scarred them so deeply that they would no longer pick up a Bible; (d) dictations by leadership of how followers should act, sometimes in great detail; (e) breakdown of personal boundaries, such as denying members permission to marry; (f) encouraging a sense of elitism or special status in the group; and (g) fostering an “us vs. them” mentality. Further, the *Dallas*

*Observer* has reported that three Trinity members have killed themselves, and other former members said they had nervous breakdowns and/or blame Trinity for the breakup marriages.

### **The False and Defamatory Posts**

25. On or about January 8, 2019, Trinity published on the Trinity Website, a fictitious, defamatory and highly inflammatory post about Pastor Luna and Casa de Dios, entitled “‘Cash’ Luna connected with convicted ‘Queen of the South’ drug trafficker?” (the “Trinity Website Post”).

26. The Trinity Website Post, authored by Evans, refers to a “three-part series” presented by “Univision, America’s largest Spanish-speaking network” called “Magnates of God” (the “Univision Story”) and publishes multiple hyperlinks to the Univision Story itself, which is written and presented in Spanish.

27. The Trinity Website Post states: “After reviewing compelling evidence presented by Univision reporters, we’ve carefully translated Part I about ‘Cash Luna’s’ alleged connections to convicted drug trafficker Marllory Chacón into English (*read translation here* or below).” The Trinity Website Post purports to include an English translation, authored by Trinity, of “Part I” the Univision Story concerning Pastor Luna and Casa de Dios, along with a link to a pdf version of Trinity’s translation on a separate page of the Trinity Website at [https://trinityfi.org/articles/Gods\\_Magnates\\_part\\_one--Cash\\_Luna--English.pdf](https://trinityfi.org/articles/Gods_Magnates_part_one--Cash_Luna--English.pdf).

28. As such, Trinity represents that it reviewed and/or investigated the “evidence presented by Univision” and independently determined that the “evidence” was so “compelling” that Trinity “carefully translated” into English “Part I” of the Univision Story about Pastor Luna’s alleged “connections to convicted drug trafficker Marllory Chacón” and published that translation to readers and viewers of the Trinity Website in the Trinity Website Post.

29. As a preface to the translation, the Trinity Website Post purports to describe Trinity's own prior "investigations of [Pastor] Luna", accusing Pastor Luna of having an "opulent lifestyle" and a "disturbing" "church-franchise business", and being related to a "strange and macabre murder" that supposedly occurred at a separate church. The Trinity Website Post also states "Luna's version of the prosperity gospel is a carbon copy of the 'name it, claim it' preachers [Trinity had] investigated herein the US". Thus, Trinity purposefully and falsely portrays Pastor Luna as being the exact type of supposedly corrupt, materialistic and greedy "TV preacher" that Trinity is on a mission to "expose" and take down. The gist of the Trinity Website Post is that the false and defamatory statements published by Trinity about Pastor Luna and Casa de Dios in Trinity's "careful" "translation" are actually true, and not merely allegations by Univision. The Trinity Website Post goes beyond merely restating the Univision Story as being just allegations made by Univision and instead adopts the substance of the Univision Story about Plaintiffs as itself true, based on Trinity's own prior supposed investigations of Plaintiffs as well as Trinity's review and investigation of the evidence presented in the Univision Story and conclusion that such evidence was "compelling".

30. A copy of the Trinity Website Post and a list of the false and defamatory statements contained in that post are attached hereto as **Exhibit 1**.

31. On January 9, 2019, Trinity published on its public Facebook page a post which includes a hyperlink to the Trinity Website Post (which contains Statements 1-20 identified in Exhibit 1 hereto) and additional false and defamatory statements about Pastor Luna and Casa de Dios (the "Trinity Facebook Post"). A copy of the Trinity Facebook Post and a list of the false and defamatory statements contained in that post are attached hereto as **Exhibit 2**. Unless



otherwise indicated, the Trinity Website Post and the Trinity Facebook Post are sometimes collectively referred to hereinafter as the “Trinity Posts.”

32. The Trinity Website Post includes multiple hyperlinks to the Univision Story, entitled *Los Magnates De Dios*, located at <https://www.univision.com/especiales/noticias/2018/magnates-de-dios-iglesias-en-latinoamerica-y-estado-unidos-lavado-de-activos-fraude-abusos/>.

The Univision Story contains an embedded video entitled “De donde salieron los millones para financiar su templo? La pregunta que rodea a ‘La casa de Dios’”, which includes a segment, entitled “Todo Por Cash” (“Everything for Cash”) (the “Video”). The false and defamatory statements contained in the Univision Story and Video are attached hereto as **Exhibit 3**.

33. In the Trinity Website Post, Trinity expressly acknowledges that “much of [the] evidence [in the Univision Story] came from an admitted Colombian cocaine-smuggling pilot”. Thus, Trinity admits that it was subjectively aware that there were obvious reasons to doubt the veracity of that informant and the accuracy of that informant’s reports, and that Trinity entertained serious doubts as to the truth of the statements in the Univision Story about Plaintiffs. Even so, despite being licensed private investigators with extensive investigative skills and resources, and despite the gravity of the accusations made against Plaintiffs, on information and belief, Trinity purposely avoided the truth and made deliberate decisions: (a) not to investigate the informant, Jorge Mauricio Bernal (“Bernal”), to determine whether he was a credible source; (b) not to interview any key witnesses with information about the relevant facts that could directly refute Bernal’s claims; (c) not to review any public court records or public documents, including with respect to Bernal; (d) not to review public denials issued by Ms. Chacón’s lawyer and also by Plaintiffs about the Univision Story; and (e) not to contact or attempt to contact

Pastor Luna, Casa de Dios, or their representatives regarding the Univision Story, the Trinity Website Post, or the Trinity Facebook Post.

34. Trinity had a preconceived agenda and storyline that it wanted to tell and “expose” about Pastor Luna and Casa de Dios (*i.e.*, as evil and greedy corrupt criminals) and, on information and belief, made little or no effort to actually check the validity of the false and defamatory statements before publishing them in the Trinity Posts.

35. Bernal is an admitted criminal, whose mental instability, extreme bias against Plaintiffs, and obvious unreliability are easily verifiable matters of public record.

36. Public court records, which were available to Trinity before it published the Trinity Posts, show that, when Bernal made his statements about Plaintiffs to Univision in or about June 2018, he was inherently unreliable, exhibited clear signs of extreme paranoia and mental instability, and was intensely biased against Plaintiffs. These public court records readily show, among other things: (a) Bernal was desperate and reached out to Univision because he had been in jail for more than two (2) years awaiting trial for felony charges of attempted murder and false imprisonment, and Bernal believed that Univision could help him with his trial; (b) Bernal’s lawyer stated in public court records in Bernal’s criminal case—before the Univision Story was published—that Bernal made “illogical and incoherent statements” and “exhibited delusional and paranoid behavior”, that Bernal’s “statements were not responsive or relevant to the conversation”, and that Bernal “continually repeated himself and could not communicate effectively with counsel”; (c) multiple attorneys in Bernal’s criminal case had filed motions to withdraw as counsel, asserting that Bernal had threatened to put a “hit” on them and Bernal claimed the attorneys had abused Bernal’s son (Bernal claimed that one attorney molested his adult son); and (d) the trial judge presiding over Bernal’s criminal case found twice (first in

August 2017 and again in May 2018) “that there are reasonable grounds to believe that [Bernal] [wa]s not mentally competent”. All of these on-the-record statements were publicly available from a simple online search at the time Trinity claims to have conducted an investigation, and prior to Trinity’s publication of the Trinity Posts.

37. In addition, from October 2017 to May 2018, while Bernal was in jail awaiting his trial, he filed nine (9) public *pro se* lawsuits against, among others, the trial judge presiding over his criminal case, the state prosecutors and public defenders and various other lawyers involved in that case, the then-Broward County Sheriff and numerous sergeants and deputies; various prison personnel, the DEA Director and several DEA agents, and the President and First Lady of the United States. Public court records in these lawsuits, which were available to Trinity before it published the Trinity Posts, raised significant red flags regarding Bernal’s mental stability, credibility, bias and motivations to lie about Plaintiffs. Any reasonable investigator, reporter, editor or publisher would have learned immediately upon reading these public *pro se* lawsuits that Bernal was not mentally competent.

38. In these public *pro se* lawsuits, Bernal made wild and inherently improbable claims, bizarre allegations, sought hundreds of millions of dollars in damages and demanded that the trial judge, the prosecutor and his prior attorneys in his criminal case all be imprisoned for trying to extort him for millions of dollars. Among other bizarre claims, Bernal alleged he was the victim of an international conspiracy headed by a corrupt DEA agent (Special Agent Paul Cohen), which spanned nearly a decade, involved at least two murder attempts of Bernal by Agent Cohen and others, and was based on Agent Cohen’s alleged manipulation and coordination of an international web of people who were related to one another in the most unlikely ways. For instance, Bernal claimed (falsely) that the trial judge in his criminal case

(Judge Geoffrey D. Cohen) was DEA Agent Cohen's father, and that Agent Cohen and Bernal's ex-wife (the victim in Bernal's criminal case) were lovers who conspired together to fabricate the attempted murder and false imprisonment charges against Bernal.

39. Public court records also show that all of the *pro se* lawsuits were dismissed before the Trinity Posts were published, and that the U.S. Magistrate Judge assigned to Bernal's *pro se* lawsuits described Bernal's allegations as "a hodgepodge of incomprehensible allegations and legalistic gibberish" and found that "[s]uch frivolous and vexatious filings should not be tolerated."

40. Furthermore, based on Bernal's claims in the public court records and posts on his public Facebook page, Bernal clearly was extremely biased against Pastor Luna and Casa de Dios when he gave his interview to Univision in June 2018 because, in Bernal's eyes, Pastor Luna was a supposed perpetrator (with Agent Cohen) in the "conspiracy" against him. Bernal's claims are fictitious and delusional: Pastor Luna and Casa de Dios had absolutely nothing to do with Agent Cohen, Bernal or Ms. Chacón. Bernal also was strongly biased in favor of Univision because he believed Univision had helped him with his criminal trial and Bernal was indebted to Univision for that. Bernal identified Univision employees (including Univision reporter Gerardo Reyes) as witnesses in a publicly available complaint he filed with the Department of Homeland Security and asylum request after he was arrested by Immigration and Customs Enforcement.

41. Further, the public court records, which were available to Trinity before it published the Trinity Posts, show that Bernal claimed that he helped take down some of the biggest drug lords in Central America (including Ms. Chacón), and supposedly feared for his life and his family's safety. Yet, rather than go into hiding (as a person fearing for their life would do), Bernal instead went on-camera to announce to the world (and his would-be assassins), his

identity, his whereabouts, and details of his alleged role in the investigation(s) that supposedly led to the incarceration of Ms. Chacón and the others. Bernal even bragged on his public Facebook page about his meetings with Univision and Gerardo Reyes and shared his Univision interview multiple times. These are not the actions of a rational or credible person who is telling the truth and trying to hide from dangerous criminals. These are the actions of a mentally unsound, delusional person who will say anything for attention. The publicly available information revealed all of this, before the Trinity Posts, and further revealed the many inconsistencies in Bernal's claims and his actions that further demonstrated a total lack of accuracy and reliability of Bernal's claims and the Univision Story.

42. Importantly, in a public Facebook post, also available to Trinity before it published the Trinity Posts, Bernal himself denounced the Univision Story as being **false**, stating: "Univision hides the truth [and] GERARDO REYES LIES TO THE WORLD." **As such, Bernal himself publicly stated that Univision hid the truth and lied to the world in the Univision Story.** This public post, available to Trinity before it published the Trinity Posts, is yet another indication of the falsity and unreliability of the Univision Story and Trinity Posts.

43. In addition, Ms. Chacón's lawyer issued a public statement (which was also available to Trinity before it published the Trinity Posts) that "the way [Univision]...invents 'facts' is out of control" and expressly **denying** that Ms. Chacón had laundered money with and/or through Pastor Luna and/or Casa de Dios. Pastor Luna and Casa de Dios also issued public statements vehemently refuting that they had any connection with Ms. Chacón and that these accusations were based on an unreliable source. These public statements were all available to Trinity before it published the Trinity Posts.

44. Furthermore, despite Trinity's admitted subjective awareness that there were obvious reasons to doubt Bernal's veracity and the accuracy of his reports, and even though Trinity entertained serious doubts as to the truth of the false and defamatory statements, on information and belief, Trinity did not contact, interview or investigate, or attempt to contact, interview or investigate, any key witnesses with information about the relevant facts that could directly refute Bernal's claims, such as Bernal himself, Agent Paul Cohen, prosecutors in the Ms. Chacón case, Ms. Chacón herself or her lawyers. Nor did Trinity attempt to contact Pastor Luna, Casa de Dios, or any of their representatives regarding the Univision Story, the Trinity Website Post, or the Trinity Facebook Post.

45. After discovering the Trinity Post in or about November 2019, on December 16, 2019, Plaintiffs made a demand on Trinity for a full and fair retraction, correction and apology as to the posts, a copy of which, without the attached exhibits, is attached hereto as **Exhibit 4**. Trinity failed and refused to comply with this demand. All conditions precedent to the filing and maintenance of this action have occurred, have been performed or have been waived.

### **FIRST CAUSE OF ACTION**

#### **(Defamation)**

46. Plaintiffs reallege and incorporate by this reference the allegations in Paragraphs 1 through 45 of this Complaint as though fully set forth herein.

47. Defendants made false statements of and concerning Plaintiffs, as specifically identified in Exhibits 1 through 3 attached hereto.

48. Defendants' false statements wrongly accuse Plaintiffs of, among other things, engaging in criminal activities in connection with drug trafficking and money laundering and/or

closely associating with a notorious drug trafficker and suspiciously evading DEA interrogation for all such alleged crimes.

49. These false statements wrongly accuse Plaintiffs of having acted in a manner that would tend to injure Plaintiffs' reputations and thereby expose Plaintiffs to public hatred, contempt, ridicule, and financial injury in Plaintiffs' communities, including Dallas, Texas.

50. These statements also wrongly accuse Plaintiffs of having acted in a manner that would tend to impeach Plaintiffs' honesty, integrity, virtues, and reputations, and thereby expose Plaintiffs to public hatred, ridicule, and financial injury in Plaintiffs' communities, including Dallas, Texas.

51. The false statements, individually and jointly, tend to so harm the reputations of Plaintiffs as to lower their reputations in Plaintiffs' communities, including Dallas, Texas, and to deter others from associating or dealing with Plaintiffs.

52. Furthermore, the Trinity Posts and Defendants' statements involve materially false implications and impressions, including the false and defamatory gist and overall impression that Plaintiffs engaged in criminal activities in connection with drug trafficking and money laundering and/or were closely associated with a notorious drug trafficker and suspiciously evaded DEA interrogation for all such alleged crimes.

53. The statements made by Defendants were false, and no applicable privilege or authorization protecting the statements can attach to them.

54. Defendants published these false statements to third parties, including but not limited to the readers and viewers of the Trinity Website and Trinity Facebook page.

55. In publishing these false statements, Defendants, at all times, either knew the statements were false, had serious doubts as to their truth, or published them with reckless disregard for, and in purposeful avoidance of, the truth.

56. Defendants admit that much of “evidence...came from an admitted Colombian cocaine-smuggling pilot” and thus, Trinity admits that it was subjectively aware that there were obvious reasons to doubt Bernal’s veracity and the accuracy of Bernal’s reports, and Trinity entertained serious doubts as to the truth of the false and defamatory statements in the Trinity Posts.

57. Even so, despite being licensed private investigators with extensive investigative skills and resources, and despite the gravity of the accusations made against Plaintiffs, on information and belief, Trinity purposely avoided the truth and made deliberate decisions: (a) not to investigate Bernal; (b) not to contact or attempt to contact any key witnesses with information about the relevant facts that could directly refute Bernal’s claims (such as Bernal himself, Agent Cohen, prosecutors in Ms. Chacón’s case, Ms. Chacón or her lawyers); (c) not to review publicly available court records and other public documents, from which it was easily verifiable that Bernal was unreliable, had a criminal record, was mentally unstable, exhibited clear signs of extreme paranoia, was intensely biased against Plaintiffs, took actions to promote himself and his interview which indicated that he was being untruthful, and denounced the Univision Story as untruthful and/or false; (d) not to review public denials issued by Ms. Chacón’s lawyer and Plaintiffs about the Univision Story; and (e) not to contact or attempt to contact Pastor Luna, Casa de Dios, or their representatives to confirm the substance of the Univision Story, the Trinity Website Post, or the Trinity Facebook Post.



58. Trinity had a preconceived agenda and storyline that it wanted to tell and “expose” about Pastor Luna and Casa de Dios, purposefully ignored the truth and available public records and information, and published the Trinity Posts and presented the statements therein as the truth. This further demonstrates Trinity’s reckless disregard for the truth and/or purposeful avoidance of it.

59. The aforementioned acts of Defendants were committed intentionally and/or with a conscious and/or reckless disregard of Plaintiffs’ rights, and with the intent to vex, injure or annoy, such as to constitute malice.

60. As a direct and proximate result of the publication of the false and defamatory statements, Plaintiffs have suffered general and special economic injury, damage, loss and harm to their reputation, in an amount to be proven at trial, which damages are continuing in nature and will be suffered in the future.

61. Defendants’ defamatory statements include statements that are defamation *per se* because they falsely accuse Plaintiffs of engaging in criminal activity and activity that also injures Plaintiffs in their office, profession and occupation.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand entry of a judgment against Defendants:

1. For an award of general, nominal, and special damages to be determined at trial;
2. For an award of exemplary damages to be determined at trial;
3. Interest thereon at the maximum legal rate;
4. Costs;

5. For a preliminary and permanent injunction against Defendants and all persons acting in concert with them, requiring deletion of the false and defamatory statements pleaded herein; and

6. For such other and further relief as to this Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: January 6, 2020

Respectfully submitted,

By: /s/ Michael K. Hurst  
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*Counsel for Plaintiffs Carlos Enrique Luna Lam  
and Iglesia Cristiana Casa de Dios*

# Exhibit 1



You are here: [Home](#) > [Uncategorized](#) > "Cash" Luna connected with convicted "Queen of the South" drug trafficker?

**Trinity Foundation, Inc.**, a public non-profit based in Dallas, Texas, has been tracking religious fraud and helping victims for almost 30 years. Sign up for email alerts and follow us:

Follow us on



#### RECEIVE TRINITY EMAIL UPDATES

Subscribe to Trinity Foundation by Email

#### THE PROBLEM

##### The Problem of Religious Fraud

Trinity Foundation's original mission was to creatively

## "Cash" Luna connected with convicted "Queen of the South" drug trafficker?

Pete January 8, 2019 0

Is Latin American televangelist "Cash" Luna connected with convicted

"Queen of the South" drug trafficker?



#### GLOBAL RELIGIOUS FRAUD REPORTS



[Click here for the latest reports on religious](#)

fraud from the U.S., Mexico, Central America, South America, Europe, Africa, the Middle East and Asia.

#### TIPS FOR PREVENTING RELIGIOUS FRAUD

If you have a loved one entangled with a greedy ministry, [here are suggestions for identifying and preventing religious fraud.](#)

## THE PROBLEM

## The Problem of Religious Fraud

Trinity Foundation's original mission was to creatively explore multiple media to communicate the message of the cross of Christ. But we found there was [an obstacle](#) that was keeping many people from hearing the true gospel.

## PROFESSOR TELLS WHY IRS IS LEAVING CHURCHES ALONE

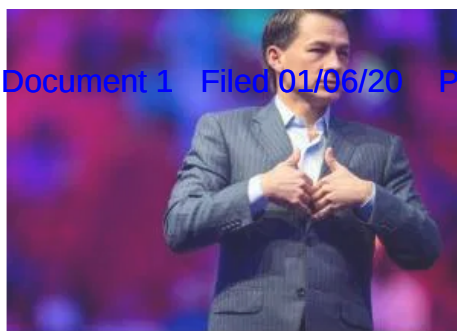
Religion News Service's Mark Silk, Professor of Religion in Public Life at Trinity College, explains why the [IRS is leaving churches alone for now...](#) and this includes the fakes as well, as far as we can tell !

## FREQUENTLY ASKED QUESTIONS

- How much money is involved in religious fraud?
- What are the different ways fraudulent ministries get funds?
- Specifically, how does this break the law?
- So why hasn't the government stopped these practices?
- What can I do?

## WHY WE INVESTIGATE

Trinity Foundation is sometimes criticized for investigating religious fraud. Some say our investigations are an attack on Christianity itself. Nothing could be further from the truth. [Read more here.](#)



Univision, America's largest Spanish-speaking network, presented a three-part series called "Magnates of God" last month. After reviewing compelling evidence presented by Univision reporters, we've carefully translated Part I about "Cash Luna's" alleged connections to convicted drug trafficker Marlory Chacón into English ([read translation here](#) or below).

Though much of their evidence came from an admitted Colombian-cocaine-smuggling pilot, Univision reporters were able to prove that Chacón and Luna's mansions were located side-by-side with a single entry gate.

## Trinity Foundation Investigations of Luna

Soon after expanding our investigations of religious fraud outside US borders in 2015, our investigator travelled to Guatemala in January 2016 taking a closer look into "Cash" Luna's mega-church, one of Luna's satellite churches, and his opulent lifestyle. Luna's version of the prosperity gospel is a carbon copy of the "name it, claim it" preachers we've investigated here in the US.



Trinity Foundation investigator's photo taken outside the church, January 2016

In previous posts we revealed Carlos (Cash's real name) lavish lifestyle and travels on his private jet.

For an impressive closer look at Luna's main church in Guatemala City, Guatemala, click on [Univision's Spanish article, "Los Magnates de Dios"](#), and view their time-lapse drone image of the "House of God" ("Casa de Dios").

## Franchise Satellite Churches

One particularly disturbing trend of the prosperity gospel is the tendency to re-make Christianity following US corporate franchise business expansion models. Almost

If you have a loved one entangled with a greedy ministry, [here are suggestions for identifying and preventing religious fraud.](#)

## VICTIMS / INFORMANTS "HOTLINE"

Report fraudulent activity and [fill out a victim abuse questionnaire](#)  
Note: you may also contact [trinity@trinityfi.org](mailto:trinity@trinityfi.org), or call 214-827-2625 if you would rather speak to a representative.

## MISSION STATEMENT



## BECOME A MEMBER

Become a yearly member for \$25, or make a donation. Donations to Trinity Foundation are tax deductible.

## Make a donation

## TRINITY IN THE NEWS

God Doesn't Need Ole Anthony — The Antichrist of East Dallas: The man [televangelists hate](#) from *The New Yorker*, Dec. 6, 2004.

Ole Anthony: End [homelessness](#) Dallas *Morning News*, Oct 27, 2005 ...

From the U.K. — Julian Charles at [themindrenewed.com](http://themindrenewed.com) interviewed Ole on May 10th, 2013 and the half-hour podcast can be found [here](#).



sometimes criticized for investigating religious fraud. Some say our investigations are an attack on Christianity itself. Nothing could be further from the truth. [Read more here.](#)

#### SENATE FINANCE COMMITTEE

In 2007 we began furnishing the committee information for its investigation into televangelists' finances and tax-exempt status. We were disappointed when, in 2011, the chairman Sen. Charles Grassley made recommendations that didn't include any new legislation.

[More Info ▶](#)

#### MEDIA INVESTIGATIONS

A sample of the investigations we have participated in and other findings on religious fraud.

[More Info ▶](#)

#### OFFSHORE TAX HAVENS?

The state of Delaware provides the least transparency and the most secrecy for creating shell corporations, according to [The New York Times](#). And the televangelists have taken notice.

[Spanish article, "Los Magnates de Dios"](#), and view their time-lapse drone image of the "House of God" ("Casa de Dios").

#### Franchise Satellite Churches

One particularly disturbing trend of the prosperity gospel is the tendency to re-make Christianity following US corporate franchise business expansion models. Almost every televangelist we've investigated has "planted" additional churches in America and around the world. Cash Luna is no different. He spreads satellite churches into other parts of Latin America.

Investigative reporter John Russell first exposed Luna's church-franchise business after uncovering a strange and macabre murder of one of his related church's pastors—details revealed in the article ["Cash Luna and the Murder of Pastor Claudio Martínez Morales" \(in English\)](#) ("Cash' Luna y el Asesinato del Pastor Claudio Martínez Morales" — [Original article en español...](#)).

Russell says that Luna's franchise member church organization is called the CIEM (Centro Internacional de Estudios Ministeriales) and each member church has to pay 10% of their revenues to CIEM as a "franchise quota." The CIEM supervises the churches closely in order to gain the full amounts levied by Luna.

Trinity Foundation will continue to follow this story and will publish updates as new information becomes available.

[Follow this link for the original Spanish language version of this story](#); Univision's impressive drone camera footage of Cash Luna's church "Casa De Dios"; and Univision television news reports throughout about Cash Luna, Maria Piraquive, Andy Zamora and the faith business of the prosperity gospel...

#### UNIVISION article By GERARDO REYES below:

Millions of low-income Hispanics in the United States and Latin America donate 10% of their monthly income to evangelical churches. It is what is known as the tithes. The faithful or the sheep, as the shepherds often call their followers, also provide cash offerings in each service and work for free for fundraising events of the same churches.

A Univision investigation that followed some of these congregations reveals that their handling of the millions of dollars donated by parishioners is not transparent and little or nothing is known about how the money is invested.

What is apparent is the luxurious lifestyle of the pastors

...  
From the [NY Times](#), Julian Charles at [themindrenewed.com](#) interviewed Ole on May 10th, 2013 and the half-hour podcast can be found [here](#).

#### AFFORDABLE HOUSING

**Why be concerned about the homeless?** Trinity's work with the homeless led directly to our work uncovering religious fraud. [Read how you can help.](#)

#### FEEDBACK

"I left church because I was so many times -what I call - 'spiritually abused'.... Please, please, please continue your work and expose these greedy and cruel liars." -- e-mail from Germany.

[Read more](#)

#### VIDEO: TELEVANGELISTS TAKE TO THE AIR!

**Video:** Televangelist Ernest Angley practices touch-and-go landings... in his 747. ... But sometimes you can [come down hard](#).

[View all of our videos here.](#)

#### BAKKER PEDDLING SURVIVAL ENEMAS?

Disgraced televangelist Jim Bakker is betting on the coming (partial) apocalypse

[More Info ▶](#)

#### WITTENBURG DOOR ON HOLD

*The Wittenburg Door* satire magazine has been 'on hold'



churches.

A Univision investigation that followed some of these congregations reveals that their handling of the millions of dollars donated by parishioners is not transparent and little or nothing is known about how the money is invested.

What is apparent is the luxurious lifestyle of the pastors and their families. Private airplanes, mansions, luxury cars and expensive clothing are part of the life of these spiritual leaders, some of whom justify it by explaining that wealth is a blessing from God, a philosophy known as the prosperity gospel.

Guatemalan shepherd Carlos 'Cash' Luna summed it up like this:

"I was taught by an apostle, who told me, 'Cash' one always carries two things to church, Bible and checkbook, the Bible to learn what God will tell you, and the checkbook to worship him".

Although they are exempt from taxes, the excessive informality with which the congregations manage their finances has led the authorities to open investigations.

#### **GOD'S MAGNATES** (1st of 3 parts)

##### **"The dark side of Casa de Dios (House of God)"**

Sources claim that Pastor 'Cash' Luna took advantage of his close friendship with Marlory Chacón, convicted in the U.S. for drug trafficking.

By **GERARDO REYES**

Cash Luna lets his voice break in front of the microphone, remembering the humble beginnings of his church, the House of God. The pastor recovers from this sadness slowly lifting his face in search of the spotlights of the stage to exclaim jubilantly, that thanks to his perseverance everything succeeded.

The 12,000 parishioners who listen celebrate the pastor's words this first Sunday of October 2018 in the immense temple of Guatemala City, the largest of its kind in Latin America.

"Is it a coincidence that we now have bread and word (of God) of this size (noting the immense church building they now have) here (compared to) when we came to a single (small, humble) house?" asks Luna claiming all their achievements are a product of his tireless spirit of service to the church under the hand of God.

This version of Luna's success is incomplete for some. Testimonies obtained by Univision point out that there was another worldlier hand that lifted the pastor and his church: that of a woman who presented herself as an investment manager in Guatemala but whose real fortune came from drug trafficking and money

More info ▶

WITTENBURG DOOR ON HOLD

*The Wittenburg Door* satire magazine has been 'on hold' since 2008. See the static website [here](#).

OLE'S BIBLE STUDY PODCASTS

Ole's Bible study podcasts are on the Community on Columbia website [here](#).

service to the church under the hand of God.

Testimonies obtained by Univision point out that there was another worldlier hand that lifted the pastor and his church: that of a woman who presented herself as an investment manager in Guatemala but whose real fortune came from drug trafficking and money laundering.

Chacón, according to the sources, delivered significant amounts of money to the pastor. She was sentenced in 2015 in the United States to 12 years in prison on charges of drug trafficking, a business she handled that ran along the length and breadth of Central America. She was known as the Queen of the South. Although the case records are to a great degree under summary concealment until a future date, the released documents do not mention Luna's name.

### Meetings with Chacón

Chacón's organization was infiltrated around 2010 by the (US) Drug Enforcement Agency—DEA. Colombian pilot Jorge Mauricio Herrera, who says he worked transporting cocaine for a powerful cartel in his country, told Univision that he infiltrated Chacón's organization under instructions from the DEA.

According to Herrera, Luna was present at the first meeting he had with Chacón in mid-2010 in Guatemala. This and other encounters were recorded by him with a video camera given him by the DEA which he wore camouflaged on a button of his shirt, he explained.

"They were basically talking about money deliveries because Pastor 'Cash' Luna said they needed to start building and advancing because the work was on the foundations," Herrera said.

According to the pilot, Luna was close to Chacón.

"The type [Luna], believe me he was Marlory's right hand [...] He was Marlory's advisor. He is a man, for me, a manipulator," explained Herrera.

The pilot clarified that Luna was not interfering in matters of drug trafficking but that the pastor was well acquainted with what business Chacón was in and that he received money from her.

"He knew that a drug pilot was coming to talk to them, he knew there was an organization, he knew that the other person with me was a partner, he knew Marlory was a drug dealer. He knew absolutely everything," said Herrera.

At the time of the meetings that describes Herrera, Chacón was a thriving drug trafficker of Central America. During court testimony for the United States against two Guatemalan brothers accused of drug





...knew there was an organization, he knew that the other person with me was a partner, he knew Marlory was a drug dealer. He knew absolutely everything," she said. Herrera.

At the time of the meetings that describes Herrera, Chacón was a thriving drug trafficker of Central America. During court testimony for the United States against two Guatemalan brothers accused of drug trafficking, she explained that she assumed her husband's drug business after he was arrested in 2002.

"I had my own workers, I had my own cocaine suppliers in Colombia, and I had my own buyers who were the Mexican cartels," Chacón said.

The prosecutor asked how much money she had laundered for the cartels. She said more than 200 million dollars.

### **Infiltrated**

A document of the case of Chacón in Miami, prepared by the district attorney's office, gives an account of a Colombian informant, only identified as CS1, who attended a meeting at the residence of Chacón in Guatemala City at the end of 2010.

During that meeting, the informant asked her if she could make the (smuggling) infrastructure available in Honduras in order to land with a shipment of 800 kilos of cocaine, the prosecution said.

The document describes what was captured by the video.

Chacón is seen and heard on video using two cell phones to coordinate the receipt of the shipment," says the document. "Chacón gave instructions on the phone for tracking specifications, and how much fuel was necessary to supply (the planes)," he adds.

Herrera claims he's the informant who recorded that meeting. The DEA does not disclose any information about its confidential sources. In a memorandum addressed to a U.S. immigration judge, Herrera explained his infiltration in the organization and said that Miami lawyer Joaquin Perez put him in touch with DEA agent Paul Cohen. Perez told Univision that he facilitated Herrera's contact with the DEA, but gave no details. A Miami DEA spokesperson said that this organization "is not going to comment on the case."

In 2010, when the covert operation that culminated with the delivery of Chacón to the United States authorities was advancing, the building project of the Temple of the House of God continued.

The impressive coliseum in the form of a Holy-Spirit-dove with a capacity for 12.000 spectators cost 45 million dollars, according to Luna when he told the BBC. The temple performs two large services on Sunday with a



the delivery of Chacón to the United States authorities was advancing, the building project of the Temple of the House of God continued.

The impressive coliseum in the form of a Holy-Spirit-dove with a capacity for 12,000 spectators cost 45 million dollars, according to Luna when he told the BBC. The temple performs two large services on Sunday with a massive display of light and sound technology. It was inaugurated in 2013 by (former) president Otto Pérez, who is serving a sentence on charges of corruption. Luna has said that the temple was built with contributions from its faithful.

At the end of the religious service on October 7th, Univision requested an interview with Luna through its spokesman Marly de Armas, letting him know about their interest in knowing the origin of church funds. She told us that the pastor would be very busy for the next two months, which would make it almost impossible for him to accept the interview. Based on the declarations of the sources interviewed, Univision sent Luna a questionnaire with 26 questions, including some asking for his version of the relationship with Chacón. More than three weeks later, Armas replied:

“We regret that you have been deceived in good faith by an unreliable source, since the information you claim to have received from that person is false.”

#### **Sacks of Money**

Another person close to the Chacón family, but who asked not to be identified, told Univision that he took cash to Luna’s house on the orders of Chacón.

“It was half a sack,” the source said, explaining that it was a bag of felt used for transporting valuables. The bags contained dollars and he delivered them in a place that was known as the “House of Horses,” he added.

According to the source, Luna constantly asked Chacón for money, which she disliked.

“That son of the great p... said, every day he wants more,” the source recalled what Chacón said.

Chacón and Luna shared the same entrance to their homes in Guatemala City, as Univision was able to verify through the images of a drone. It is a piece of land south of the city near the highway to El Salvador where there are only both residences, separated by less than fifty meters and surrounded by an imposing wall.

“They had the same gate but used different intercoms,” the source explained.

Herrera also remembers that, according to him, the first meeting with Chacón was in the the woman’s house. The pilot described the residence as an “extraordinary mansion” surrounded by a zoo “in the style of Pablo



meters and surrounded by an imposing wall.

"They had the same gate but used different intercoms," the source explained.

Herrera also remembers that, according to him, the first meeting with Chacón was in the the woman's house. The pilot described the residence as an "extraordinary mansion" surrounded by a zoo "in the style of Pablo Escobar". He was struck, he explained, that outside the house, in the open air, fragrance atomizers were intermittently activated to neutralize the smell of animal excrement.

"We arrived to the front entry, there was tremendous security. After we passed a first ring of safety, we were locked between two sets of bars," said Herrera, "the first to give permission to enter was Mr. Cash Luna. He gave his authorization and we entered."

## Lifestyle

The real name of 'Cash' Luna is Carlos. The charismatic pastor of 56 years has explained that the reason people ended up calling him 'Cash' was because he could not pronounce his name correctly as a child and instead of Carlos said 'Cash'. His critics have said that it is a name that perfectly fits he and his family's sophisticated lifestyle in one of the poorest countries in Central America.

His fortune has been a constant object of criticism and suspicion. Luna, 56 years old, travels in a Cessna Citation with American registration (N-200LH). It was acquired in September 2014 under Glory Wings 3, a company registered in Delaware, the paradise of corporate anonymity in the United States. Next, he transferred it to Casa de Dios and finally registered it under a trust of the Bank of Utah that does not reveal the owner's names. In an interview with the BBC network, Luna said the plane is owned by the church. A person familiar with the transaction, who asked not to be identified, explained that the aircraft was purchased for \$2 million. After the purchase, Luna made some improvements for about \$250,000 dollars and painted a biblical passage reference "Mark XII" on one of the turbines.

In the last six months Luna has used the plane to travel to Colombia and Mexico. In these countries the pastor presented campaigns on stage platforms known as Nights of Glory attended by thousands of followers in which he imparts controversial healing blessings to the sick.

Many of Luna's fans don't seem to be worried about his lifestyle. Robin Martinez, who was a photographer for the congregation, told Univision that what is important is the message that God sends through the pastor.

"If he misuses the tithe (people's donations) he will



of every attended by thousands of followers in which he imparts controversial healing blessings to the sick. Many of Luna's fans don't seem to be worried about his lifestyle. Robin Martinez, who was a photographer for the congregation, told Univision that what is important is the message that God sends through the pastor.

"If he misuses the tithe (people's donations) he will realize that, but I go to the word that transformed me and that he gave me," said Martinez who now does reporting on a bicycle in Guatemala City. "I can't just put my eyes on money management," he added.

### The Delivery

Herrera, the Colombian pilot, said he had decided to work with the DEA because he knew that the entity was keeping tabs on his boss, Daniel "The Madman" Barrera, and sooner or later would catch up with him. His (Herrera's) work at that time consisted of smuggling cocaine shipments in executive planes to Central America and Africa from runways in Venezuela, where he said he had the protection of the Governments of Presidents Hugo Chávez and Nicolás Maduro.

"I believe that 90% of Colombia's cartels moved to Venezuela, all of them. We met many there in restaurants working for different groups," recalled Herrera.

According to Herrera, Cohen, the DEA's supervisory agent, approved the infiltration operation after the pilot explained Chacón's power and importance in Central America.

"Marllory (Chacón) was the new drug trafficker of a new era and was even above "Chapo" Guzman, says Herrera.

The infiltration operation into Chacón's organization was so effective, Herrera said, that he did not have to spend a single day in federal prison. Public records consulted by Univision do not show any charges for drug trafficking against him. Other sources familiar with his passage through the drug cartels confirmed to Univision that Herrera was a discreet and daring pilot. According to them, he flew dangerous routes from airports on the Venezuelan coast to Guinea, West Africa, with planes that had to refuel in mid-air.

In an interview last July in front of Univision cameras, Herrera explained that his relationship with Cohen was complicated because the agent withdrew him from the operation in Guatemala without any explanation. Herrera questioned that the DEA had not at least interrogated Pastor Luna. After his relationship was broken with the DEA, the pilot was left in a migratory limbo.

Less than two weeks after the Univision interview, ICE agents broke into his Miami residence and transferred him to the Krome detention center. On October 31st he



Herrera questioned that the DEA had not at least  
 broken with the DEA, the pilot was left in a migratory  
 limbo.

Less than two weeks after the Univision interview, ICE  
 agents broke into his Miami residence and transferred  
 him to the Krome detention center. On October 31st he  
 was deported to Colombia where he fears for his life.

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Next Post: [Televangelist Todd Coontz is going down...](#)

The post published on <https://trinityfi.org> on or about January 8, 2019, entitled “Cash” Luna connected with convicted “Queen of the South” drug trafficker?, contains the following false defamatory statements:

|     | Statement   |
|-----|---|
| 1.  | Title: “Cash” Luna connected with ‘Queen of the South’ drug trafficker?<br><br>Is Latin American televangelist “Cash” Luna connected with convicted “Queen of the South” drug trafficker?   |
| 2.  | After reviewing the compelling evidence presented by Univision reporters, we’ve carefully translated Part I about “Cash Luna’s” alleged connections to convicted drug trafficker Marlory Chacón into English ( <i>read translation here</i> [link to translation] or below).                                  |
| 3.  | For an impressive closer look at Luna’s main church in Guatemala City, Guatemala, click on <b>Univision’s Spanish article, “Los Magnates de Dios”</b> [link to Univision article], and view their time-lapse drone image of the “House of God” (“Casa de Dios”).  |
| 4.  | <i>Follow this link for original Spanish language version of this story; Univision’s impressive drone camera footage of Cash Luna’s church ‘Casa De Dios’</i> [link to Univision article]; <i>and Univision television news reports throughout about Cash Luna...and the faith business of prosperity...”</i> |
| 5.  | UNIVISION article By GERARDO REYES below:<br><br>GOD’S MAGNATES (1st of 3 parts)<br><br>“The dark side of Casa de Dios (House of God)”  |
| 6.  | Sources claim that Pastor ‘Cash’ Luna took advantage of his close friendship with Marlory Chacón, convicted in the U.S. for drug trafficking.   |
| 7.  | Testimonies obtained by Univision point out that there was another worldlier hand that lifted the pastor and his church: that of a woman who presented herself as an investment manager in Guatemala but whose real fortune came from drug trafficking and money laundering.                                  |
| 8.  | Chacón, according to the sources, delivered significant amounts of money to the pastor.   |
| 9.  | <b>Meetings with Chacón</b><br>According to [Jorge Mauricio] Herrera, Luna was present at the first meeting he had with Chacón in mid-2010 in Guatemala.  |
| 10. | “They were basically talking about money deliveries because Pastor ‘Cash’ Luna said they needed to start building and advancing because the work was on the foundations,” Herrera said.   |



|     |  |
|-----|--|
| 11. | According to the pilot [Herrera], Luna was close to Chacón.  |
| 12. | “The type [Luna], believe me he was Marllory’s right hand [...] He was Marllory’s advisor. He is a man, for me, a manipulator,” explained Herrera.   |
| 13. | [T]he pastor was well acquainted with what business Chacón was in [drug trafficking] and that he [Luna] received money from her.   |
| 14. | “He [Luna] knew that a drug pilot was coming to talk to them, he knew there was an organization, he knew that the other person with me was a partner, he knew Marllory was a drug dealer. He knew absolutely everything,” said Herrera.  |
| 15. | <b>Sacks of Money</b><br>Another person close to the Chacón family, but who asked not to be identified, told Univision that he took cash to Luna’s house on the orders of Chacón.  |
| 16. | “It was half a sack,” the source said, explaining that it was a bag of felt used for transporting valuables. The bags contained dollars and he delivered them in a place that was known as the “House of Horses,” he added.  |
| 17. | According to the source, Luna constantly asked Chacón for money, which she disliked.   |
| 18. | “That son of the great p...[sic] said, every day he wants more,” the source recalled what Chacón said.   |
| 19. | Herrera also remembers that, according to him, the first meeting with Chacón was in the woman’s house... “We arrived to the front entry, there was tremendous security. After we passed a first ring of safety, we were locked between two sets of bars,” said Herrera, “the first to give permission to enter was Mr. Cash Luna. He gave his authorization and we entered.” |
| 20. | In an interview last July in front of Univision cameras, Herrera explained that his relationship with [DEA Agent Paul] Cohen was complicated because the agent withdrew him from the operation in Guatemala without any explanation. Herrera questioned that the DEA had not at least interrogated Pastor Luna.  |



# Exhibit 2



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**Trinity Foundation Inc.**

January 9 · 🌐

Is Latin American televangelist "Cash" Luna connected with convicted "Queen of the South" drug trafficker?

Read our yesterday's blog post citing Univision's Spanish language investigative report along with our English translation

<https://trinityfi.org/.../cash-luna-connected-with-convicted.../>

Univision reporters uncovered compelling evidence connecting Cash Luna with drug smuggler Marlory Chacón, a/k/a "Queen of the South", allegedly more powerful than "El Chapo" Joaquín Guzmán before being convicted here in the US. Trinity Foundation began investigating Luna's jet-set lavish lifestyle, his NFL-stadium-sized church, and his franchise churches in 2015.



TRINITYFI.ORG

**"Cash" Luna connected with convicted "Queen of the South" drug trafficker?**

Is Latin American televangelist "Cash" Luna connected with convicted "Queen of the South" drug trafficker? Univision, America's largest...

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**Trinity Foundation Inc.**

August 9, 2018 · 🌐

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Trinity Foundation, Inc. is a non-profit based in Dallas, Texas that has been tracking religious fr...

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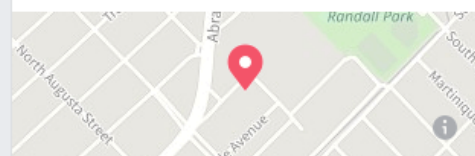
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Trinity Foundation Inc.

August 9, 2018 ·

Have you or someone you know ever been a victim of religious fraud (such as from an evangelist, a ponzi scheme, etc.) or observed unethical or fraudulent behavior in a religious ministry? Please report the experience...



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Author

Trinity Foundation Inc. Hi Cheryl, you can call me on my cell phone at 214-738-3349 if you want. I

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View 1 more reply



William Vose Um, where's the questionnaire?

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Trinity Foundation Inc.

November 20 at 3:44 PM ·

When Churches Use Shell Corporations, They Have Something to Hide  
Marty Boone was recently sentenced to seven years in prison after being convicted of tax refund fraud and money laundering.

The Vallejo Times-Herald reported that Marty and wife Rhonda Boone set up "a shell corporation in Cyprus and a church in the state of Washington" to launder illegally obtained tax refunds. ... See More



Trinity Foundation Inc.'s Post

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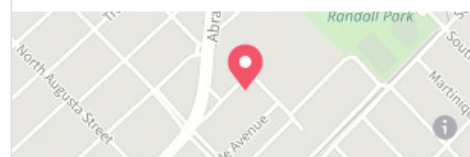
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The post published on Trinity Foundation, Inc.’s public Facebook page on or about January 9, 2019 contains the following false and defamatory statements, in addition to the false and defamatory statements identified in Exhibit 1:

|     | <b>Statement</b>  |
|-----|---|
| 21. | Is Latin American televangelist “Cash” Luna connected with convicted “Queen of the South” drug trafficker?  |
| 22. | Univision reporters uncovered compelling evidence connecting Cash Luna with drug smuggler Marlory Chacón, a/k/a “Queen of the South”, allegedly more powerful than “El Chapo” Joaquin Guzman before being convicted here in the US. |

# Exhibit 3

The post published on <https://trinityfi.org> on or about January 8, 2019 includes multiple hyperlinks to the Univision story, entitled *Los Magnates De Dios*, located at <https://www.univision.com/especiales/noticias/2018/magnates-de-dios-iglesias-en-latinoamerica-y-estado-unidos-lavado-de-activos-fraude-abusos/> (the “Univision Story”), which contains the following false and defamatory statements:

|     | Statement   | Translation  |
|-----|---|--|
| 23. | El lado oscuro de la Casa de Dios   | The dark side of Casa de Dios  |
| 24. | Las fuentes aseguran que el pastor ‘Cash’ Luna sacó provecho de su cercana amistad con Marllory Chacón, condenada en EEUU por narcotráfico.   | Sources assure that Guatemalan Pastor Carlos ‘Cash’ Luna took advantage of his close friendship with Marllory Chacón, sentenced in the U.S. for drug smuggling.  |
| 25. | Testimonios obtenidos por Univision apuntan a que hubo otra mano más mundana que sacó adelante al pastor [Pastor Luna] y a su iglesia [Casa de Dios]: la de una mujer que se presentaba como inversionista empresarial en Guatemala pero cuya verdadera fortuna venía del narcotráfico y el lavado de dinero. | According to witness accounts obtained by Univision, there are more earthly factors to the pastor’s [Pastor Luna] and his church’s [Casa de Dios] success: a Guatemalan woman posing as an investor and businesswoman in Guatemala, but whose true fortune was as a result of drug smuggling and money laundering. |
| 26. | Marllory Chacón, según las fuentes, entregaba importantes cantidades de dinero al pastor [Pastor Luna].   | According to the source, Marllory Chacón, was a major contributor of money to the pastor [Pastor Luna].  |
| 27. | Según Herrera, Luna estuvo presente en la primera reunión que él tuvo con Chacón a mediados de 2010 en Guatemala.   | According to Herrera, Luna was in the first meeting he had with Chacón in Guatemala in 2010.   |
| 28. | “Básicamente estaban hablando [Pastor Luna and Marllory Chacón Rosell] de entregas de dinero porque el pastor ‘Cash’ Luna decía que necesitaban ya empezar a construir y avanzar porque la obra estaba en bases”, dijo Herrera.   | “They [Pastor Luna and Marllory Chacón Rosell] were basically talking about delivering money because the pastor, ‘Cash’ Luna, said they had laid the groundwork for (building) the church and needed to move forward with the project,” claimed Herrera.   |
| 29. | Según el piloto [Herrera], Luna era una persona cercana a Chacón.   | According to the pilot [Herrera], Luna was close to Chacón.  |
| 30. | “El tipo [Pastor Luna], créame que era la mano derecha de Marllory [...] él era el consejero de Marllory. Es un hombre, para mí, manipulador”, explicó Herrera.   | “Trust me, that dude [Pastor Luna] was Marllory’s right hand. He was her advisor. To me, he’s a manipulative man,” said Herrera.   |

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|-----|--|---|
| 31. | ...el pastor [Pastor Luna] sabía de sobra en qué negocio estaba su amiga Chacón y recibía dinero de ella.  | ...he [Pastor Luna] knew very well what Chacón's business was and he accepted her money.  |
| 32. | "Él sabía [Pastor Luna] que venía un piloto del narcotráfico a hablar con ellos, sabía que había una organización, sabía que la otra persona conmigo era socia, sabía que Marllory era una narcotraficante. Él sabía absolutamente todo", dijo Herrera.  | "He [Pastor Luna] knew that a drug smuggling pilot was coming to talk to them. He knew there was an organization and that the other individual with me was a partner. He knew that Marllory was a drug dealer. He knew absolutely everything," said Herrera, describing the events at the time. |
| 33. | Otra persona cercana a la familia Chacón, pero que pidió no ser identificada, explicó a Univision que llevó dinero en efectivo a la casa de Luna por órdenes de Chacón.  | A person close to Chacón's family, who asked to remain anonymous, told Univision that they took money to Luna's house on Chacón's orders.   |
| 34. | "Fue como medio costal", dijo la fuente, al explicar que se trataba de unas bolsas de fieltro que se usan para el transporte de valores. Las bolsas contenían dólares y las entregó en un lugar que era conocido como la "Casa de los Caballos", agregó. | "It was like half a bag," the source said, explaining that they were felt bags used for transporting valuables. The bags contained dollars and he delivered it to a place known as the "Casa de Caballos" (House of Horses), he added.  |
| 35. | Según la fuente, Luna le pedía constantemente dinero a Chacón, lo que a ella le disgustaba.<br><br>"Que hijo de la gran p... decía, [Pastor Luna] cada día quiere más", recuerda la fuente que decía Chacón.   | According to the source, Luna constantly asked Chacón for money, which bothered her.<br><br>"'Son of a b....', she would say. '[Pastor Luna] wants more each time'," the source said, quoting Chacón.   |
| 36. | "El primero que salió [casa de Marllory Chacón Rosell] en dar la autorización para entrar fue el señor 'Cash' Luna. Él dio la autorización y entramos".  | "The first one to come out [of Marllory Chacón Rosell's house] and authorize our access was 'Cash' Luna. He approved, and we went in."  |



The Univision Story also contains an embedded video, entitled *De donde salieron los millones para financiar su templo? La pregunta que rodea a “La casa de Dios”*, which includes a segment, entitled *Todo Por Cash* (“Everything for Cash”) (the “Video”). The Video contains the following additional false and defamatory statements:

|     | <b>Time Stamp</b> | <b>Statement</b>  | <b>Translation</b>  |
|-----|-------------------|---|---|
| 37. | 3:36-3:51         | Gerardo Reyes:<br>Según él [Jorge Herrera], la obra [por Casa de Dios] recibió dinero de la narcotraficante guatemalteca Marllory Chacón Rosell, conocida como la Reina del Sur. El piloto colombiano afirma que en algunas de las reuniones con ella estaba Cash Luna. | Gerardo Reyes:<br>According to him [Jorge Herrera], the building project [for Casa de Dios] received money from the Guatemalan drug dealer Marllory Chacón Rosell, also known as the Queen of the South. The Colombian pilot states that in some of the meetings with her, Cash Luna was there. |
| 38. | 3:52-3:59         | Jorge Herrera:<br>Prácticamente estaban hablando [Pastor Luna and Marllory Chacón Rosell] de entregas de dinero porque, el pastor Cash Luna decía que necesitaban empezar a construir y avanzar la obra.  | Jorge Herrera:<br>They [Pastor Luna and Marllory Chacón Rosell] were basically speaking about money deliveries, because pastor Cash Luna said that they needed to start the building project and advance the work.  |
| 39. | 4:00-4:09         | Gerardo Reyes:<br>Herrera aclaró que Luna no se inmiscuía en cuestiones de narcotráfico, pero sabía que él era un piloto al servicio de un cartel colombiano.   | Gerardo Reyes:<br>Herrera clarifies that Luna never interfered in drug trafficking issues, but he knew that he was a pilot at the service of Colombian cartel.  |
| 40. | 4:10-4:17         | Jorge Herrera:<br>Él [Pastor Luna] sabía que venía un piloto del narcotráfico a hablar a hablar con [Marllory Chacón Rosell], sabía que Marllury era una narcotraficante, él sabía absolutamente todo.  | Jorge Herrera:<br>He [Pastor Luna] knew that there was a drug trafficking pilot coming to talk with [Marllory Chacón Rosell], he knew that she was a drug dealer, he knew absolutely everything.  |
| 41. | 5:51-6:16         | Gerardo Reyes:<br>Este hombre [Testigo oculto] sostiene que la relación de la narcotraficante con Luna iba más allá de la de ser vecinos. Recuerda haber llevado dinero de Chacón a la casa del pastor, y de ser testigo de la relación entre                           | Gerardo Reyes:<br>This man [Anonymous Witness] argues that the relationship between the drug dealer and Luna was more than just being neighbors. He remembers to have taken some of Chacón’s money to the pastor’s house and being a witness of the relationship                                |



|     | Time Stamp | Statement   | Translation  |
|-----|------------|---|--|
|     |            | <p>Luna y Chacón, por lo que pidió no ser identificado.</p> <p>Gerardo Reyes:<br/>¿Qué cantidad de bolsas vio que le entregaban con el dinero a Cash Luna?</p> <p>Testigo oculto:<br/>Una como medio costal, por ahí.</p>   | <p>between Luna and Chacón so he asked not to be identified.</p> <p>Gerardo Reyes:<br/>How many bags did you see were given with the money to Cash Luna?</p> <p>Anonymous Witness:<br/>One with like half-a-sack, around that.</p>   |
| 42. | 6:17-6:34  | <p>Gerardo Reyes:<br/>Según él [Testigo oculto], Chacón se quejaba de que Luna estaba siempre pidiéndole dinero.</p> <p>Testigo oculto:<br/>Que yo sepa, le pedía dinero para su iglesia.</p> <p>Gerardo Reyes:<br/>¿Y ella cómo reaccionaba ante eso?</p> <p>Testigo oculto:<br/>Eh... Qué hijo de la gran p[...], decía. Cada día quiere más. Porque él le pedía conforme a lo que ella tenía, o ingresos que ella tenía.</p> | <p>Gerardo Reyes:<br/>According to him [Anonymous Witness], Chacón complained that Luna was always asking her for money.</p> <p>Anonymous Witness:<br/>As far as I know, he was asking for money for the church.</p> <p>Gerardo Reyes:<br/>And how did she react to that?</p> <p>Anonymous Witness:<br/>What a son of a b..., he wants more every day. Because he was asking according to what she had or the income that she had.</p> |

# Exhibit 4



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December 16, 2019

***CONFIDENTIAL***

**VIA EMAIL, OVERNIGHT MAIL  
AND MESSENGER**

Mr. Ole Anthony, President  
Mr. Pete Evans, Lead Investigator  
Trinity Foundation, Inc.  
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Dallas, Texas 75214  
Email: [trinity@trinityfi.org](mailto:trinity@trinityfi.org)  
[pete@trinityfi.org](mailto:pete@trinityfi.org)

**Re: Pastor Carlos Luna / Casa de Dios – Demand for Retraction,  
Correction, Clarification and Apology**

Dear Mssrs. Anthony and Evans:

This firm is litigation counsel for Pastor Carlos Luna Lam (“Pastor Luna”) and Iglesia Cristiana Casa de Dios (“Casa de Dios”). We are writing with regard to multiple false and defamatory statements about Pastor Luna and Casa de Dios that were published by Trinity Foundation, Inc. (“Trinity”) in the following: (1) a post on Trinity’s website, dated on or about January 8, 2019, available at <https://trinityfi.org/uncategorized/cash-luna-connected-with-convicted-queen-of-the-south-drug-trafficker/> (the “Trinity Website Post”); and (2) a post on Trinity’s Facebook page, dated on or about January 9, 2019, available at [https://www.facebook.com/permalink.php?story\\_fbid=10156093307278575&id=54915028574](https://www.facebook.com/permalink.php?story_fbid=10156093307278575&id=54915028574) (the “Trinity Facebook Post”). The Trinity Facebook Post contains a link to the Trinity Website Post. The Trinity Website Post and Trinity Facebook Post shall be collectively referred to herein as the “Posts”. Copies of the Posts are enclosed for your reference.

Demand is hereby made that Trinity publish a full, fair and conspicuous retraction, correction, clarification and apology as to each false and defamatory statement in the Posts. The false and defamatory statements in the Trinity Website Post include the following:

1. Title: “Cash” Luna connected with ‘Queen of the South’ drug trafficker?

Is Latin American televangelist “Cash” Luna connected with convicted “Queen of the South” drug trafficker?

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Re: Pastor Luna and Casa de Dios

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2. After reviewing the compelling evidence presented by Univision reporters, we've carefully translated Part I about "Cash Luna's" alleged connections to convicted drug trafficker Marlory Chacón into English (*read translation here* [link to translation] or below).
3. For an impressive closer look at Luna's main church in Guatemala City, Guatemala, click on ***Univision's Spanish article, "Los Magnates de Dios"*** [link to Univision article], and view their time-lapse drone image of the "House of God" ("Casa de Dios").
4. *Follow this link for original Spanish language version of this story; Univision's impressive drone camera footage of Cash Luna's church 'Casa De Dios' [link to Univision article]; and Univision television news reports throughout about Cash Luna...and the faith business of prosperity... "*
5. UNIVISION article By GERARDO REYES below:  
  
GOD'S MAGNATES (1st of 3 parts)  
  
"The dark side of Casa de Dios (House of God)"
6. Sources claim that Pastor 'Cash' Luna took advantage of his close friendship with Marlory Chacón, convicted in the U.S. for drug trafficking.
7. Testimonies obtained by Univision point out that there was another worldlier hand that lifted the pastor and his church: that of a woman who presented herself as an investment manager in Guatemala but whose real fortune came from drug trafficking and money laundering.
8. Chacón, according to the sources, delivered significant amounts of money to the pastor.
9. **Meetings with Chacón**  
According to [Jorge Mauricio] Herrera, Luna was present at the first meeting he had with Chacón in mid-2010 in Guatemala.
10. "They were basically talking about money deliveries because Pastor 'Cash' Luna said they needed to start building and advancing because the work was on the foundations," Herrera said.
11. According to the pilot [Herrera], Luna was close to Chacón.
12. "The type [Luna], believe me he was Marlory's right hand [...] He was Marlory's advisor. He is a man, for me, a manipulator," explained Herrera.

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Re: Pastor Luna and Casa de Dios

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13. [T]he pastor was well acquainted with what business Chacón was in [drug trafficking] and that he [Luna] received money from her.
14. “He [Luna] knew that a drug pilot was coming to talk to them, he knew there was an organization, he knew that the other person with me was a partner, he knew Marlory was a drug dealer. He knew absolutely everything,” said Herrera.
15. **Sacks of Money**  
Another person close to the Chacón family, but who asked not to be identified, told Univision that he took cash to Luna’s house on the orders of Chacón.
16. “It was half a sack,” the source said, explaining that it was a bag of felt used for transporting valuables. The bags contained dollars and he delivered them in a place that was known as the “House of Horses,” he added.
17. According to the source, Luna constantly asked Chacón for money, which she disliked.
18. “That son of the great p...[sic] said, every day he wants more,” the source recalled what Chacón said.
19. Herrera also remembers that, according to him, the first meeting with Chacón was in the woman’s house... “We arrived to the front entry, there was tremendous security. After we passed a first ring of safety, we were locked between two sets of bars,” said Herrera, “the first to give permission to enter was Mr. Cash Luna. He gave his authorization and we entered.”
20. In an interview last July in front of Univision cameras, Herrera explained that his relationship with [DEA Agent Paul] Cohen was complicated because the agent withdrew him from the operation in Guatemala without any explanation. Herrera questioned that the DEA had not at least interrogated Pastor Luna.

The Trinity Facebook Post includes a hyperlink to the Trinity Website Post (which contains Statements 1-20 above), and contains the following additional false and defamatory statements:

21. Is Latin American televangelist “Cash” Luna connected with convicted “Queen of the South” drug trafficker?
22. Univision reporters uncovered compelling evidence connecting Cash Luna with drug smuggler Marlory Chacón, a/k/a “Queen of the South”, allegedly more powerful than “El Chapo” Joaquin Guzman before being convicted here in the US.

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As mentioned above, the Trinity Website Post contains multiple hyperlinks to a Univision story, entitled *Los Magnates De Dios*, located at <https://www.univision.com/especiales/noticias/2018/magnates-de-dios-iglesias-en-latinoamerica-y-estado-unidos-lavado-de-activos-fraude-abusos/> (the “Univision Story”). The Univision Story contains the following additional false and defamatory statements:

|     | Statement   | Translation  |
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| 23. | El lado oscuro de la Casa de Dios   | The dark side of Casa de Dios  |
| 24. | Las fuentes aseguran que el pastor ‘Cash’ Luna sacó provecho de su cercana amistad con Marllory Chacón, condenada en EEUU por narcotráfico.   | Sources assure that Guatemalan Pastor Carlos ‘Cash’ Luna took advantage of his close friendship with Marllory Chacón, sentenced in the U.S. for drug smuggling.  |
| 25. | Testimonios obtenidos por Univision apuntan a que hubo otra mano más mundana que sacó adelante al pastor [Pastor Luna] y a su iglesia [Casa de Dios]: la de una mujer que se presentaba como inversionista empresarial en Guatemala pero cuya verdadera fortuna venía del narcotráfico y el lavado de dinero. | According to witness accounts obtained by Univision, there are more earthly factors to the pastor’s [Pastor Luna] and his church’s [Casa de Dios] success: a Guatemalan woman posing as an investor and businesswoman in Guatemala, but whose true fortune was as a result of drug smuggling and money laundering. |
| 26. | Marllory Chacón, según las fuentes, entregaba importantes cantidades de dinero al pastor [Pastor Luna].   | According to the source, Marllory Chacón, was a major contributor of money to the pastor [Pastor Luna].  |
| 27. | Según Herrera, Luna estuvo presente en la primera reunión que él tuvo con Chacón a mediados de 2010 en Guatemala.   | According to Herrera, Luna was in the first meeting he had with Chacón in Guatemala in 2010.   |
| 28. | “Básicamente estaban hablando [Pastor Luna and Marllory Chacón Rosell] de entregas de dinero porque el pastor ‘Cash’ Luna decía que necesitaban ya empezar a construir y avanzar porque la obra estaba en bases”, dijo Herrera.   | “They [Pastor Luna and Marllory Chacón Rosell] were basically talking about delivering money because the pastor, ‘Cash’ Luna, said they had laid the groundwork for (building) the church and needed to move forward with the project,” claimed Herrera.   |
| 29. | Según el piloto [Herrera], Luna era una persona cercana a Chacón.   | According to the pilot [Herrera], Luna was close to Chacón.  |
| 30. | “El tipo [Pastor Luna], créame que era la mano derecha de Marllory [...] él era el consejero de Marllory. Es un hombre, para mí, manipulador”, explicó Herrera.   | “Trust me, that dude [Pastor Luna] was Marllory’s right hand. He was her advisor. To me, he’s a manipulative man,” said Herrera.   |

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| 33. | Otra persona cercana a la familia Chacón, pero que pidió no ser identificada, explicó a Univision que llevó dinero en efectivo a la casa de Luna por órdenes de Chacón.  | A person close to Chacón's family, who asked to remain anonymous, told Univision that they took money to Luna's house on Chacón's orders.   |
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The Univision Story also contains an embedded video, entitled “De donde salieron los millones para financiar su templo? La pregunta que rodea a ‘La casa de Dios’”, which includes a segment, entitled “Todo Por Cash” (“Everything for Cash”) (the “Video”). The Video contains the following additional false and defamatory statements:

|     | <b>Time Stamp</b> | <b>Statement</b>  | <b>Translation</b>  |
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| 39. | 4:00-4:09         | Gerardo Reyes:<br>Herrera aclaró que Luna no se inmiscuía en cuestiones de narcotráfico, pero sabía que él era un piloto al servicio de un cartel colombiano.   | Gerardo Reyes:<br>Herrera clarifies that Luna never interfered in drug trafficking issues, but he knew that he was a pilot at the service of Colombian cartel.  |
| 40. | 4:10-4:17         | Jorge Herrera:<br>Él [Pastor Luna] sabía que venía un piloto del narcotráfico a hablar a hablar con [Marllory Chacón Rosell], sabía que Marllory era una narcotraficante, él sabía absolutamente todo.  | Jorge Herrera:<br>He [Pastor Luna] knew that there was a drug trafficking pilot coming to talk with [Marllory Chacón Rosell], he knew that she was a drug dealer, he knew absolutely everything.  |
| 41. | 5:51-6:16         | Gerardo Reyes:<br>Este hombre [Testigo oculto] sostiene que la relación de la narcotraficante con Luna iba más allá de la de ser vecinos. Recuerda haber llevado dinero de Chacón a la casa del pastor, y   | Gerardo Reyes:<br>This man [Anonymous Witness] argues that the relationship between the drug dealer and Luna was more than just being neighbors. He remembers to have taken some of Chacón’s money to   |

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Re: Pastor Luna and Casa de Dios

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|     | Time Stamp | Statement  | Translation  |
|-----|------------|--|--|
|     |            | de ser testigo de la relación entre Luna y Chacón, por lo que pidió no ser identificado.   | the pastor's house and being a witness of the relationship between Luna and Chacón so he asked not to be identified.                             |
|     |            | Gerardo Reyes:<br>¿Qué cantidad de bolsas vio que le entregaban con el dinero a Cash Luna?   | Gerardo Reyes:<br>How many bags did you see were given with the money to Cash Luna?  |
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| 42. | 6:17-6:34  | Gerardo Reyes:<br>Según él [Testigo oculto], Chacón se quejaba de que Luna estaba siempre pidiéndole dinero.   | Gerardo Reyes:<br>According to him [Anonymous Witness], Chacón complained that Luna was always asking her for money.                             |
|     |            | Testigo oculto:<br>Que yo sepa, le pedía dinero para su iglesia.   | Anonymous Witness:<br>As far as I know, he was asking for money for the church.  |
|     |            | Gerardo Reyes:<br>¿Y ella cómo reaccionaba ante eso?   | Gerardo Reyes:<br>And how did she react to that?   |
|     |            | Testigo oculto:<br>Eh... Qué hijo de la gran p[...], decía. Cada día quiere más. Porque él le pedía conforme a lo que ella tenía, o ingresos que ella tenía. | Anonymous Witness:<br>What a son of a b..., he wants more every day. Because he was asking according to what she had or the income that she had. |

Each of the statements listed above is false and defamatory, and serves no purpose other than to disparage, injure and harass my clients, and is causing them substantial harm. The statements falsely claim that Pastor Luna was closely connected to a convicted drug trafficker, Mallory Chacón Rosell (known as “The Queen of the South”), that Pastor Luna was her supposed “advisor”, and that Pastor Luna allegedly accepted and laundered for her large sums of money, including in connection with the construction of a new church for Casa de Dios. These statements are 100% false. Pastor Luna was not Ms. Chacón’s advisor and had no connection with her whatsoever, other than his knowledge that she had bought a residential property next to

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his. Nor have my clients ever requested or received any money from Ms. Chacón for any reason, including to build a church. My clients never laundered money for Ms. Chacón or anyone else. They have always complied with all applicable laws with respect to donations, and built the church with funds from contributions from their congregation and other legitimate sources.

These statements are defamatory because, among other things: (a) the statements falsely accuse my clients of engaging in criminal activities in connection with drug trafficking and money laundering and/or closely associating with a notorious drug trafficker and suspiciously evading DEA interrogation for all such alleged crimes; and (b) the statements tend to injure my clients' reputations and thereby expose them to public hatred, contempt and/or ridicule, financial injury; and/or tend to impeach my clients' honesty, integrity, virtues, and reputation(s), and thereby expose my clients to public hatred, ridicule, and/or financial injury.

Trinity's publication of the Posts constitutes libel *per se*, libel *per quod*, false light invasion of privacy, intentional infliction of emotional distress, and tortious interference with business relations, among other claims. Remedies for Trinity's legal violations include, among others, actual damages, special damages, punitive damages, and temporary and permanent injunctive relief.

Accordingly, we hereby demand that Trinity remove, retract, correct, clarify and apologize for each of the false and defamatory statements in a type and place as conspicuous as the original Posts.

Please confirm in writing **by close of business on December 20, 2019** that the foregoing demands will be, and are being, fully complied with.

You are officially on notice of this dispute and therefore you are required to undertake steps to affirmatively preserve, and not delete, any and all physical and electronic documents, materials, information, and data that pertain in any way to Pastor Luna and Casa de Dios, including without limitation all emails, text messages, instant messages (IMs), letters and memoranda, articles, and social media postings (including all drafts as well as final versions of all written communications), as well as all other types of written, physical and digital materials including handwritten notes, typewritten notes, summaries, charts, receipts, audio recordings, video recordings, photographs, telephone call logs, calendar entries of all types, financial data and information, etc. that pertain in any way to the Posts, to Pastor Luna, to Casa de Dios and/or that might otherwise be relevant or related to the foregoing matters. All sources of documents, materials, information, and data should be preserved, including without limitation, physical files, electronic and digital files, computer servers, email servers, backup tapes, cloud storage, personal computers, hard drives, smart phones, tablets, and other types of storage devices including external drives, thumb drives, zip drives, disks and DVDs. Failure to affirmatively preserve such documents and materials could result in severe sanctions imposed by a court which could include, among other remedies, monetary sanctions, evidentiary sanctions, issue sanctions and/or the striking of an answer and entry of a default judgment.

December 16, 2019  
Re: Pastor Luna and Casa de Dios  
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This is a confidential legal communication and is not intended for publication.

This demand letter is not intended to be a full or exhaustive list of all false and defamatory statements you have made about my clients, nor should anything herein be construed as a waiver, release or relinquishment of any rights, remedies, claims or causes of action available to my clients, all of which are reserved.

We look forward to your prompt response to this letter.

Very truly yours,



CHARLES J. HARDER Of  
**HARDER LLP**

Enclosures: Trinity Website Post; Trinity Facebook Post  
cc: Ryan J. Stonerock, Esq.; Lan P. Vu, Esq.

**AFFIDAVIT OF DELIVERY**

Came to my hand on **Monday, December 16, 2019 at 3:25 PM**,  
Executed at: **5640 COLUMBIA AVENUE, DALLAS, TX 75214**  
within the county of at **4:15 PM**, on **Monday, December 16, 2019**,  
by individually and personally delivering to the within named:

**PETE EVANS**

a true copy of this

**DEMAND LETTER**

having first endorsed thereon the date of the delivery.

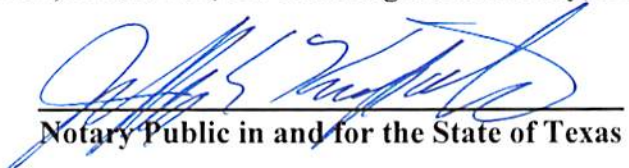
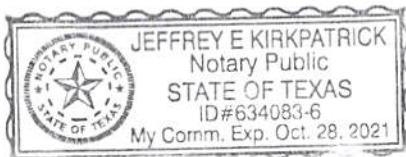
**BEFORE ME**, the undersigned authority, on this day personally appeared **Ernesto Martin Herrera** who after being duly sworn on oath states: "My name is **Ernesto Martin Herrera**. I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

By:



**Ernesto Martin Herrera - PSC 4418 - Exp 11/30/21**  
**served@specialdelivery.com**

**Subscribed and Sworn to by Ernesto Martin Herrera, Before Me, the undersigned authority, on this 17<sup>th</sup> day of December, 2019.**



**Notary Public in and for the State of Texas**